

EXHIBIT “C”

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHIRLEY T. BURTON, on behalf of plaintiff
and the class defined herein,

Plaintiffs,

vs.

NATIONS RECOVERY CENTER, INC.;
ATLANTIC CREDIT & FINANCE SPECIAL
FINANCE UNIT III, LLC,

Defendants.

CASE NO.: 1:13-cv-1426-BMC

**DECLARATION OF SHIMSHON
WEXLER IN SUPPORT OF JOINT
MOTION FOR CLASS CERTIFICATION**

I, Shimshon Wexler, of full age, hereby certify as follows:

1. I am an attorney duly admitted to practice law in the State of New York and the Bar of this Court. I am counsel of record for Plaintiff, Shirley T. Burton and, as such, I am familiar with all of the facts set forth herein and state them to be true. I submit this affidavit in support of the Parties' Joint Motion for Class Certification.

2. I have been admitted to practice law in the State of New York since 2010 and have remained a member in good standing since that time. I am also admitted to practice law before the United States District Courts for the Eastern District of New York, Southern District of New York, Northern District of New York and Western District of New York. I am also admitted to practice before the bar of the Northern District of Florida. I am also admitted to practice law before the United States Court of Appeals for the Second Circuit.

3. My license to practice law has never been suspended or revoked by the State of New York or by any court. There are no disciplinary proceedings pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

4. I received my bachelor's degree from Touro College in 2003 and graduated from New York Law School in 2009.

5. Just following and prior to my graduation from law school and admission to the New York bar I worked as a paralegal and attorney for the law firm of Herzfeld & Rubin, PC.

6. In connection with my foregoing legal work experience, I have worked on a variety of complex commercial and consumer matters. Since leaving Herzfeld & Rubin, PC in late 2010, I have been engaged as a solo practitioner and have a growing practice representing consumers on claims under the Fair Debt Collection Practices Act, 15 U.S.C. §§1692, *et seq* the Electronic Funds Transfer Act 15 U.S.C. §§1693, *et seq* and the Fair Credit Reporting Act 15 U.S.C. §§1681, *et seq*. I am now, and have been, involved in actions brought as individual claims as well as class actions. My cases have been filed in the Eastern District of New York, Western District of New York and the Southern District of New York.

7. I have been certified to act as sole class counsel in the FDCPA consumer class action lawsuits of *Gonzalez v Relin, Goldstein & Crane, LLP*, U.S. District Court, S.D.N.Y. Case No. 12-cv-783-ER and *Fried v. The Bank of Castile*, U.S. District Court, W.D.N.Y. Case No. 12-cv-624-WMS.

8. The majority of my law practice is contingent fee litigation on behalf of plaintiffs. I regularly represent plaintiffs in contingent fee cases in Federal Courts throughout the State of New York. I frequently work with other plaintiff's lawyers who handle cases on a contingent fee basis and, in that regard, I am generally familiar with the range of contingent fee percentages charged by plaintiff's lawyers.

In accordance with 28 U.S.C. §1746, I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 30, 2013, in New York, NY

s/ Shimshon Wexler

Shimshon Wexler, Esq. (SW-0770)

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*One of the Attorneys for Plaintiff, Shirley T.
Burton, and all others similarly situated*